

CERS Regulator User Group Notes and Action Items 8/16/2011

Action Items:

- Next meeting will be Tuesday, September 13, 2011 from 8:30am-10:00am.

Agenda 8/16/2011

- Approved

Please email any agenda item suggestions to Cathie and Dan one week prior to next meeting (9/13/2011).

Meeting notes from 7/12/2011

- Informally approved based on no comments/concerns raised.

Reminder: Decisions from this group are binding. Cal/EPA is writing CERS code based on these decisions.

Presentation of CERS2 - Not Business as Usual

Chris Allen of Cal/EPA presented: "*CERS2: Not Business as Usual*"

(<http://cers.calepa.ca.gov/TempDocs/RegUserGroup/2011/08162011/CERS2ChangeSummary.pdf>)

During the presentation, several questions/discussions occurred which are highlighted below.

- Chris emphasized the new concept in CERS2 that a Facility Submittal is made up of one or more "Submittal Elements," that Submittal Elements reflect UPCF interdependencies and various statutory/regulatory mandates and don't always align with past paper-based business processes, and that they will provide many benefits to businesses and regulators. A list of the CERS2 Submittal Elements was presented, and regulators were encouraged to become familiar with them now.
- Chris initiated a discussion on whether the Submittal Status names *Approved* and *Not Approved* were more meaningful/useful than *Accepted* and *Not Accepted*. Most, but not all members agreed that *Approved* and *Not Approved* would be acceptable if a clear caveat were provided stating that *Approved* did not imply the data had been verified by an inspection.

AFTERNOTE: After further internal discussion Cal/EPA adopted *Accepted* and *Not Accepted* because there was not a unanimous decision and because the term *Approved* could present problems for local agencies if new information later invalidated or contradicted the approval. *Accepted* continues to mean only that the submittal appears to meet the reporting requirement and does not imply that the UPA has had the opportunity to validate the data.

- Chris mentioned the US EPA term “CME” will be used fairly widely in CERS2 documentation, and stands for “Compliance, Monitoring, & Enforcement.” This term is roughly equivalent to the Inspection + Violation + Enforcement data covered in the Title 27 Data Dictionary.
 - Two policies will be written in the near future:
 - One will likely state that the UPA must submit CME data to CERS at least quarterly (within 45 days). SWRCB representative Terry Snyder mentioned that SOC data has certain reporting requirements that might conflict with the proposed policy. Cal/EPA will research this issue.
 - One will likely state that business submission data must be provided to CERS within 15 days, including data submitted via a local portal.
- There was a brief discussion regarding the need for UPAs to be able to change submission status and to be able to edit the submission status comment field after it has been set to 'accepted'.

AFTERNOTE: After further internal discussion Cal/EPA agreed on the importance of regulators to be able to change an *Accepted* submittal element to *Not Accepted*, particularly because a subsequent inspection may reveal submittal element(s) data was inaccurate, as James Weckerle initially mentioned in the meeting.

- Cal/EPA will be releasing to regulators a draft guide on the CERS2 data seeding process in the next few weeks. Chris reminded regulators that the facility data seeding process will involve multiple steps and could be a significant undertaking for some UPAs depending upon the completeness of their data. More details will follow in the draft guide.
- A revised CERS2 Document Upload policy has just been released and is available at <http://cers.calepa.ca.gov/TempDocs/RegUserGroup/2011/08162011/CERS2DocumentUploadsPoliciesV2.pdf>. This updates a version released in March 2011, and provides various corrections and clarifications to reflect the current status of CERS2 development. Generally, the corrections/clarifications are not significantly different than the previous version.

Announcements:

- Cal/EPA Staffing Changes: Brittani, Cathie and Jessie
 - Brittani has left Cal/EPA
 - Cathie will cover the grants desk
 - Jessie will cover the CERS help desk
- Cal/EPA staff apologized for the late start and absence of web conference visuals during the course of the meeting.

Adjournment:

Meeting was adjourned at 10:20 am